

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS**

In re:)	In proceedings under Chapter 7
)	Honorable Manuel Barbosa
Phillip M. Pawlowski,)	
Athena P. Pawlowski,)	Case No. 08 B 72055
)	
Debtors.)	

**RESPONSE TO DEBTORS' MOTION
FOR REDEMPTION**

COMES NOW DaimlerChrysler Financial Services Americas, L.L.C. ("Chrysler Financial"), by counsel, and responds as follows to Debtors' Motion for Redemption:

1. Chrysler Financial admits the allegations contained in paragraphs 1 through 2.
2. Chrysler Financial denies the allegations contained in paragraph 3.
3. Chrysler Financial lacks sufficient information to admit or deny the allegations contained in paragraph 4 and so, denies same.
4. Chrysler Financial admits the allegations contained in paragraph 5.
5. Chrysler Financial maintains that the fair market value of the 2005 Kia Sorento is at least \$12,775.00 based upon N.A.D.A. Used Car Guide. See Exhibit A attached hereto and incorporated herein by reference.

WHEREFORE, Chrysler Financial respectfully prays that this Court deny Debtors' Motion for Redemption, and for any such other and further relief as this Court may deem just and proper.

RIEZMAN BERGER, P.C.

/s/ Kathryn A. Klein

Kathryn A. Klein, #06199235

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PROOF OF SERVICE

The undersigned states that I served the attached Response to Motion of Redemption filed by DaimlerChrysler Financial Services Americas, L.L.C. upon the parties named below by first-class mail, postage prepaid, on the 29th day of July, 2008. Parties able to receive electronic filing also receive a copy electronically.

Phillip M. Pawlowski
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Poplar Grove, IL 61065

Debtor

Athena P. Pawlowski
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Debtor

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Chapter 7 Trustee

Office of the United States Trustee
780 Regent Street, Suite 304
Madison, WI 53715

/s/ Kathryn A. Klein